

5 August 2019



Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

Consultation: Reducing Customers' Switching Times (RRC0031/ERC0276)

Energy Queensland Limited (Energy Queensland) appreciates the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on the *Reducing Customers' Switching Times* consultation paper.

While our general comments are provided in the attached document, we would like to specifically express our concern with the proposed change to remove a retailer's ability to recover undercharging on an estimated final account when a customer moves, while leaving the retailer responsible for the energy and network charges associated with the revised reads. This risk is present whether the estimated read is a market estimate or a customer read.

Should you require additional information or wish to discuss any aspect of Energy Queensland's submission, please do not hesitate to contact me on (07) 3851 6787.

Yours sincerely

A handwritten signature in cursive script that reads "Trudy Fraser".

Trudy Fraser
Manager Policy and Regulatory Reform
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Encl: EQL response to submission

ENERGY QUEENSLAND LIMITED FEEDBACK

SUBMITTER DETAILS

ORGANISATION: Energy Queensland Limited (EQL)

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CHAPTER 3 – 3.1 PROPOSED NER AMENDMENTS

<p>1. Do you agree that clause 7.8.9(e)1 of the NER restricts the delivery of the proposed changes to the customer transfer procedures and process?</p>	<p>EQL does not believe that the current wording of clause 7.8.9(e)1 of the NER would necessarily restrict the delivery of the proposed changes to the customer transfer procedures and process.</p> <p>As the clause allows the incoming Retailer to nominate a Metering Coordinator, Metering Provider or Metering Data Provider (MDP) to be effective on or, where requested by the Incoming retailer, after the day that the market load at the connection point transfers to the incoming Retailer as the new FRMP, it appears to provide sufficient flexibility to accommodate the proposed changes.</p>
<p>2. Are there any impacts from removing clause 9.8.9(e) 1 from the NER and allowing the MC, MP or MDP roles for metering installations to be nominated in the procedures but as a separate request or in parallel to a retail customer transfer?</p>	<p>EQL see no impacts and approve of the proposal to separate the change of FRMP and change of metering parties into a separate process with distinct change requests.</p>
<p>3. Are there any unintended impacts from removing or clarifying clause 7.8.9 (e) 2 of the NER and including the requirement in AEMO's meter churn procedures?</p>	<p>There are no impacts that EQL can foresee.</p>
<p>4. Are the existing provisions in the NERR related to customer billing impacting consumers utilising alternative meter read options and switching electricity retailers in a timely manner?</p>	<p>No comment.</p>
<p>5. Is there any evidence to suggest that customers with manually read metering installations would not take up alternative meter read options to transfer retailers in a timely and seamless manner?</p>	<p>From the perspective of our distribution network service providers (DNSPs) Ergon Energy Network and Energex, EQL does not believe its DNSPs have enough customer interaction to be able to answer this question.</p> <p>However, EQL is of the view that customers, where there have been long-term access issues, with no recent actual readings, would prefer to transfer on an actual read rather</p>

	than run the risk of a significant discrepancy on the final bill which could require a rebill.
6. Based on AEMO's proposed high level design and changes to the existing procedures, are clarifications required to clause 21(1) of the NERR to remove ambiguity about issuing final bills on estimate metering data?	EQL is concerned with the proposal to remove a retailer's ability to recover undercharging on an estimated final account when a customer moves while leaving the retailer responsible for the energy and network charges associated with the revised reads. This risk would remain present whether the estimated read is a market estimate or a customer read.
7. Are additional provisions required in the NERR to address overcharging and dispute resolution arrangements in situations when a retail electricity customer has transferred using estimate meter read?	No comment.
8. Is there any additional information requirements needed for a customer to transfer retailers using different forms of meter reads, including self, last billable or estimate meter read?	EQL would question the proposal to remove the NS read type as we believe that some customers and retailers would be satisfied with continuing to use this method. EQL questions why AEMO has discarded the option of using a customer self-read to facilitate a transfer. ENERGEXM and WBAYM, as the MDPs for EQL, currently have the facility to take and validate customer self-reads and would be willing to facilitate the process of transfer on a customer self-read. EQL would like to see provision for a transfer on an estimate to be prohibited if that customer had not had an actual read within the 12 months prior to transfer, or within the period of occupancy if the transfer was also a change of customer.

CHAPTER 4 – ASSESSMENT FRAMEWORK

9. Are the any other matters that should be considered in the proposed assessment framework for this rule change request?	EQL would like to seek clarification regarding the diagram at p25 of the High Level Design document. <ul style="list-style-type: none"> • Is AEMO proposing that all objections are removed, even the ones currently available to the MDP? These include, but aren't limited to, where the NMI is LARGE with BASIC metering, where the proposed read type is incorrect given the metering or unsupported within the jurisdiction, where we know as MDP that our meter has been removed and/or a CR6000 series is in progress, or where there has been long term access issues and we would not wish to transfer on a further estimate. • Is AEMO proposing to remove the concept of REQ and PEND for the CR1000 transfer process as the diagram does not appear to allow for this? • Is AEMO proposing this diagram for prospective transfers? Does that mean that a CR1000 proposing a future dated transfer, on 1st September, for instance, would go complete tomorrow? If so what would happen if the meter was changed in the meantime? How would the new MC/MDP/MPB know that a customer transfer was pending?
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	<ul style="list-style-type: none">• Is AEMO proposing that for Type 6 meters the MDP would create estimates to fulfil the transfer read for all prospective transfers? <p>AEMO also talks about reviewing the 'concurrent transfer' process. EQL believe this should include the concurrency of 1000s and 6000s as a change of metering can impact on the ability for a prospective customer transfer to then go ahead.</p> <p>Are AEMO proposing to introduce a new skip/edit code for estimates created to facilitate a transfer?</p>